

EXHIBIT A



18
2017-69312

State of New Jersey
Department of Banking and Insurance
Office of the Commissioner

Chris Christie
Governor

PO Box 325
Trenton, NJ 08625-0325

Richard J. Badolato
Commissioner

Kim Guadagno
Lt. Governor

Tel (609) 292-7272

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

5/9/2017

RECEIVED

MAY 13 2017

KYLE L. JENNINGS

Attention: KYLE L. JENNINGS
CORPORATE SECRETARY
AMERICAN GENERAL LIFE INSURANCE COMPANY
2919 ALLEN PARKWAY, L4-01
HOUSTON, TX 77019

RE: Helen Strassfeld, as Executrix of the Estate of Joseph Strassfeld,
Deceased v. American General Life Insurance Company
Superior Court of New Jersey, Bergen County Law Division
Docket No. : BER-L-3097-17

Dear Sir/Madam:

You are hereby notified that on this date the Commissioner of the New Jersey Department of Banking and Insurance has accepted original service of process on your behalf in the above-captioned matter. The documents served are enclosed herein.

By copy of this letter I am advising the Attorney for the Plaintiff(s) in this matter and certifying with the Clerk of the Court that these documents have been transmitted to you, and confirming that the Commissioner of Banking and Insurance is not authorized to receive service of any further documents in this action.

Very Truly Yours,

A handwritten signature in blue ink that appears to read "Debra A. Mullen".

Debra A. Mullen

Administrative Assistant

C: Harold M. Hoffman, Esq.
240 Grand Avenue
Englewood, NJ 07631

Clerk of the Superior Court, Bergen County



HAROLD M. HOFFMAN, ESQ.
ATTORNEY ID NO. 006531984
240 GRAND AVENUE
ENGLEWOOD, NJ 07631
(201) 569-0086
ATTORNEY FOR PLAINTIFF

HELEN STRASSFELD, as Executrix of the Estate of
Joseph Strassfeld, Deceased,

Plaintiff,

-against-

AMERICAN GENERAL LIFE INSURANCE
COMPANY,

Defendant.

SUPERIOR COURT OF NEW JERSEY
BERGEN COUNTY - LAW DIVISION

DOCKET NO.: BER-L-3097-17

CIVIL ACTION

SUMMONS

From the State of New Jersey To the Defendant(s) named above:

AMERICAN GENERAL LIFE INSURANCE COMPANY

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The Complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided). If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, CN-971, Trenton, NJ 08625. A \$200 filing fee, payable to the Clerk of the Superior Court, and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

Dated: May 5, 2017

/s/ Michelle M. Smith

Michelle M. Smith, Superior Court Clerk

Name of Defendant to be Served:

AMERICAN GENERAL LIFE INSURANCE COMPANY

Address of Defendant to be Served:

c/o Office of Legislation & Regulation, NJ Dep't of Banking & Insurance
20 West State Street, PO Box 325, Trenton, NJ 08625

ATLANTIC COUNTY Deputy Clerk of the Superior Court Civil Division, Direct Filing 1201 Bachrach Blvd., 1 st Fl. Atlantic City, NJ 08401 LAWYER REFERRAL (609) 345-3444 LEGAL SERVICES (609) 348-4200	CUMBERLAND COUNTY Deputy Clerk of the Superior Court Civil Case Management Office Broad & Fayette Sts., PO Box 10 Bridgeton, NJ 08302 LAWYER REFERRAL (856) 692-6207 LEGAL SERVICES (856) 451-0003	MERCER COUNTY Deputy Clerk of the Superior Court Local Filing Office, Court House 175 S. Broad St., PO Box 8D6B Trenton, NJ 08650 LAWYER REFERRAL (609) 585-6200 LEGAL SERVICES (609) 695-6249	SALEM COUNTY Deputy Clerk of the Superior Court 92 Market St., PO Box 29 Salem, NJ 08079 LAWYER REFERRAL (856) 935-5629 LEGAL SERVICES (856) 451-0003
BERGEN COUNTY Deputy Clerk of the Superior Court Case Processing Section - Rm 113 Justice Center - 10 Main St. Hoboken, NJ 07060 LAWYER REFERRAL (201) 498-0044 LEGAL SERVICES (201) 487-2166	ESSEX COUNTY Deputy Clerk of the Superior Court 237 Hall of Records 165 Dr. Martin Luther King, Jr. Blvd. Newark, NJ 07102 LAWYER REFERRAL (973) 533-6755 Legal Services (973) 624-5000	MIDDLESEX COUNTY Deputy Clerk of the Superior Court Court House, 1 st Fl. 1 Kennedy Sq., PO Box 2633 New Brunswick, NJ 08903-2633 LAWYER REFERRAL (732) 828-0053 LEGAL SERVICES (732) 249-7600	SOMERSET COUNTY Deputy Clerk of the Superior Court Civil Division Office Court House, 3 rd Fl. Somerville, NJ 08876 LAWYER REFERRAL (908) 685-2323 LEGAL SERVICES (908) 231-0840
BURLINGTON COUNTY Deputy Clerk of the Superior Court Central Processing Office Attn: Judicial Intake 49 Rancocas Rd., 1 st Fl. Mt. Holly, NJ 08060 LAWYER REFERRAL (609) 261-1662 LEGAL SERVICES (609) 261-1088	GLOUCESTER COUNTY Deputy Clerk of the Superior Court Civil Case Management Office Broad & Delaware Streets Woodbury, NJ 08096 LAWYER REFERRAL (856) 818-4589 LEGAL SERVICES (856) 964-9400	MONMOUTH COUNTY Deputy Clerk of the Superior Court 71 Monument Park, PO Box 1260 Court House Freehold, NJ 07728-1262 LAWYER REFERRAL (732) 431-5511 LEGAL SERVICES (732) 866-0020	SUSSEX COUNTY Deputy Clerk of the Superior Court Sussex County Judicial Center 43-47 High Street Newton, NJ 07860 LAWYER REFERRAL (973) 267-5882 LEGAL SERVICES (973) 383-7400
CAMDEN COUNTY Deputy Clerk of the Superior Court Civil Processing Office Hall of Records, Suite 150 101 S. Fifth St. Camden, NJ 08103-1001 LAWYER REFERRAL (856) 964-520 LEGAL SERVICES (856) 964-2010	HUDSON COUNTY Deputy Clerk of the Superior Court Administration Bldg. Hudson Fee Office, Room G-9 595 Newark Ave. Jersey City, NJ 07306 LAWYER REFERRAL (201) 798-2727 LEGAL SERVICES (201) 792-6363	MORRIS COUNTY Deputy Clerk of the Superior Court Civil Division PO Box 910 Montville, NJ 07930-0910 LAWYER REFERRAL (973) 267-5882 LEGAL SERVICES (973) 285-6911	UNION COUNTY Deputy Clerk of the Superior Court Court House, Room 107 2 Broad Street Elizabeth, NJ 07207-6073 LAWYER REFERRAL (908) 351-4715 LEGAL SERVICES (908) 354-4340
CAPE MAY COUNTY Deputy Clerk of the Superior Court Court House 9 N. Main Street Cape May, NJ 08210 LAWYER REFERRAL (609) 463-0313 LEGAL SERVICES (609) 465-3001	HUNTERDON COUNTY Deputy Clerk of the Superior Court Civil Division 65 Park Avenue Flemington, NJ 08822 LAWYER REFERRAL (908) 735-2611 LEGAL SERVICES (908) 782-7979	OCEAN COUNTY Deputy Clerk of the Superior Court Court House, Room 121 118 Washington St. Toms River, NJ 08754 LAWYER REFERRAL (732) 240-3666 LEGAL SERVICES (732) 341-2727	WARREN COUNTY Deputy Clerk of the Superior Court Civil Division Office Court House 413 Second Street Belvidere, NJ 07823-1500 LAWYER REFERRAL (908) 387-1835 LEGAL SERVICES (908) 475-2010
		PASSAIC COUNTY Deputy Clerk of the Superior Court Civil Division Court House 77 Hamilton St. Paterson, NJ 07505 LAWYER REFERRAL (973) 278-9223 LEGAL SERVICES (973) 523-2900	

HAROLD M. HOFFMAN, ESQ.
ATTORNEY ID NO. 006531984
240 GRAND AVENUE
ENGLEWOOD, NJ 07631
(201) 569-0086
ATTORNEY FOR PLAINTIFF

HELEN STRASSFELD, as Executrix of the
Estate of Joseph Strassfeld, Deceased,

Plaintiff,

-against-

**AMERICAN GENERAL LIFE INSURANCE
COMPANY,**

Defendant.

SUPERIOR COURT OF NEW JERSEY
BERGEN COUNTY - LAW DIVISION

DOCKET NO.: BER-L-3097-17

CIVIL ACTION

COMPLAINT AND JURY DEMAND

Plaintiff Helen Strassfeld, as Executrix, by her counsel, Harold M. Hoffman, Esq., for
her Complaint against Defendant, respectfully alleges as follows:

The Parties

1. At all relevant times, Plaintiff Helen Strassfeld ("Helen") was a resident of Englewood, New Jersey, in the County of Bergen. On February 24, 2017, the Bergen County Surrogate issued Letters Testamentary to Helen to administer the Estate of her beloved husband, Rabbi Joseph Strassfeld.

2. Helen lived for many years at 273 Epps Avenue, in Englewood, along with her husband, Rabbi Joseph Strassfeld, until his death on January 8, 2017. At the time of his death, Rabbi Strassfeld was 66 years old. He and Helen had been married for over 44 years.

3. Rabbi Strassfeld died of esophageal cancer, which was diagnosed less than two years earlier. Esophageal cancer occurs when the tissue that lines the esophagus becomes malignant. The esophagus is the tube that connects the throat to the stomach, allowing food to pass. The survival rates for those suffering from esophageal cancer are low and the condition is harsh. Rabbi Strassfeld was treated with surgery and chemotherapy, among other treatments, and he suffered greatly during the last twenty-three months of his life. He was hospitalized for much of that time; and, for extended periods, not in control of his faculties.

4. At the time of his death, and for many years prior, Rabbi Strassfeld was Dean of *Yeshiva Ohr Simcha of Englewood Inc.*, a tax exempt educational institution located in Englewood, New Jersey (hereinafter "Yeshiva Ohr Simcha"). Rabbi Strassfeld was a well known and beloved educator and public figure in Englewood, especially in its active and well-respected Jewish community.

5. Defendant **American General Life Insurance Company** ("American General") is authorized to sell life insurance products in the State of New Jersey and it conducts

substantial business in this State. Upon information and belief, American General is a Texas corporation, headquartered in Houston, TX.

Rabbi Strassfeld's Life Insurance Policy

6. In or about January of 2008, at the age of 57, and nine years before his death, Rabbi Strassfeld purchased from American General a term life insurance policy, designated as Policy No. YHE0064063 (hereinafter "Rabbi Strassfeld's life insurance policy" or, the "life insurance policy").

7. Rabbi Strassfeld's life insurance policy had an annual premium of approximately \$3,800, which he paid monthly, and a death benefit of \$1 million. The beneficiary of the death benefit designated by Rabbi Strassfeld upon purchase of the life insurance policy was Yeshiva Ohr Simcha, the charitable, educational institution to which he was so dedicated and which he served so faithfully. Yeshiva Ohr Simcha remained the beneficiary of Rabbi Strassfeld's life insurance policy, throughout the balance of his life.

**Rabbi Strassfeld and American General contract for
a Third-Party to receive Contemporaneous Notice of
cancellation, lapse, or final termination of the life insurance policy**

8. In January of 2014, after Rabbi Strassfeld's life insurance policy had been in force and effect and fully paid on a monthly basis for six full years, Rabbi Strassfeld received written notice from American General of the opportunity to exercise the option of:

"designating a third party to receive a copy of any cancellation, lapse or final termination notices"

under the life insurance policy. American General advised Rabbi Strassfeld, in writing, that

"if you designate a third party, we will mail that individual a copy of these [cancellation, lapse or final termination] notices at the same time we mail the notification to you."

9. At the time he received the foregoing option offer from American General, Rabbi Strassfeld, albeit in good health, was 63 years old. At the time, he felt that exercise of the option offered by American General – to have a third party receive direct and contemporaneous notice of potential life insurance policy cancellation, lapse or termination – was a provident and responsible course.

10. Accordingly, on or about January 28, 2014 – more than six full years after purchase of the life insurance policy – utilizing the written form provided to him by American General, Rabbi Strassfeld exercised the option offered to him by American General and instructed that the third party designee for receipt of contemporaneous notice of cancellation, lapse or termination of the life insurance policy, be his son-in-law, Elchonon Butrimovitz ("Elchonon"), with contemporaneous notice to be mailed to Elchonon at: 101 W. Forest Avenue, Englewood, NJ.

Rabbi Strassfeld is Stricken with Esophageal Cancer

11. In the late Winter of 2015, more than a year after exercising American General's third party notice option, Rabbi Strassfeld was diagnosed with esophageal cancer.

12. For the next 22-23 months, until his death in January of 2017, Rabbi Strassfeld was gravely ill. He underwent, at various times, surgery, chemotherapy and other extreme therapeutic interventions. For extended periods, including from October of 2015 through March of 2016, he was often, as a result of these therapeutic interventions, delirious and not in control of his faculties.

13. In February of 2016, during the foregoing period of delirium and after more than eight full years of faithful payment of the monthly premium on the life insurance policy, Rabbi Strassfeld missed a \$315 monthly premium payment and American General terminated the life insurance policy.

14. American General failed and refused to honor express terms of its contractual arrangement with Rabbi Strassfeld which explicitly called for contemporaneous notice to Elchonon of policy cancellation, lapse and/or termination. Elchonon, Rabbi Strassfeld's third party designee, was not notified that a \$315 policy premium payment had been missed and/or that the policy had lapsed, terminated, and/or been cancelled.

COUNT I

15. Plaintiff repeats and realleges the prior allegations of this complaint as if fully set forth at length.

16. Defendant's conduct in purporting to terminate the Policy without contemporaneous, written notice to Elchonon, as expressly agreed in writing, was invalid,

ineffective, in breach of express terms of the contractual arrangement between Rabbi Strassfeld and American General, and of no force and effect.

17. As a proximate result of American General's conduct, Plaintiff, as Executrix, was damaged and suffered the improper and unlawful confiscation of a valuable asset of Rabbi Strassfeld's estate.

WHEREFORE, Plaintiff demands judgment against the Defendant as follows:

- A. Ordering Defendant to reinstate and honor the life insurance policy and the death benefit payable thereunder;
- B. Awarding Plaintiff compensatory damages in an amount to be proven at trial;
- C. Awarding Plaintiff punitive damages in an amount to be proven at trial by reason of defendant's unlawful and outrageous termination of the life insurance policy;
- D. Awarding the Plaintiff her costs, expenses and reasonable legal fees in pursuing the claims stated herein; and,
- E. Awarding plaintiff such other and further relief as the Court deems just, proper and equitable.

JURY DEMAND

Demand is hereby made for trial by jury as to all issues.

TRIAL COUNSEL DESIGNATION

Pursuant to Rule 4:25-4, the Court is respectfully advised that Harold M. Hoffman, Esq., is hereby designated as plaintiff's trial counsel.

CERTIFICATION PURSUANT TO RULE 4:5-1

Harold M. Hoffman, counsel for plaintiff, hereby certifies that the matter in controversy is not the subject of any other known pending action in this or any other Court, or any pending arbitration, nor is any other action or arbitration known to be contemplated, other than those disclosed in pleadings filed by parties to this action. At this time, no other known party is anticipated for joinder.

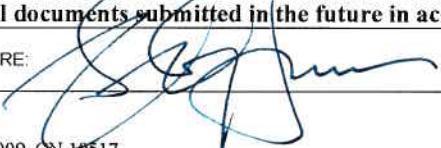
I certify that the foregoing is true to the best of my knowledge. I am aware that if any of the foregoing is wilfully false, I am subject to punishment.



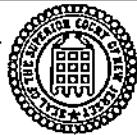
Harold M. Hoffman
Counsel for Plaintiff

Dated: May 4, 2017

Appendix XII-B1

CIVIL CASE INFORMATION STATEMENT (CIS)			FOR USE BY CLERK'S OFFICE ONLY
<p style="text-align: center;">Use for initial Law Division Civil Part pleadings (not motions) under Rule 4:5-1 Pleading will be rejected for filing, under Rule 1:5-6(c), if information above the black bar is not completed or if attorney's signature is not affixed.</p>			<input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA CHG/CK NO. AMOUNT: OVERPAYMENT: BATCH NUMBER:
ATTORNEY/PRO SE NAME HAROLD M. HOFFMAN, ESQ.		TELEPHONE NUMBER (201) 569-0086	COUNTY OF VENUE Bergen
FIRM NAME (If applicable)		DOCKET NUMBER (When available) L- 3097 -17	
OFFICE ADDRESS 240 GRAND AVENUE, ENGLEWOOD, NJ 07631-4352 hoffman.esq@verizon.net		DOCUMENT TYPE COMPLAINT	JURY DEMAND <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
NAME OF PARTY (e.g., John Doe, Plaintiff) HELEN STRASSFELD, as Executrix of the Estate of Joseph Strassfeld, Deceased		CAPTION HELEN STRASSFELD, as Executrix of the Estate of Joseph Strassfeld, Deceased, v. AMERICAN GENERAL LIFE INSURANCE COMPANY	
CASE TYPE NUMBER (See reverse side for listing) 599		IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53A-27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.	
RELATED CASES PENDING? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, LIST DOCKET NUMBERS	
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY, IF KNOWN <input type="checkbox"/> NONE <input checked="" type="checkbox"/> UNKNOWN	
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.			
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION			
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, IS THAT RELATIONSHIP <input type="checkbox"/> EMPLOYER-EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS	
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY?		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION:			
 DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS?		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION:	
WILL AN INTERPRETER BE NEEDED?		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YES, FOR WHAT LANGUAGE:	
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).			
ATTORNEY SIGNATURE: 			

SIDE 2



CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial pleadings (not motions) under Rule 4:5-1

CASE TYPES (Choose one and enter number of case type in appropriate space on the reverse side.)

Track I — 150 days' discovery

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (INCLUDING DECLARATORY JUDGMENT ACTIONS)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (SUMMARY ACTION)
- 999 OTHER (Briefly describe nature of action)

Track II — 300 days' discovery

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603 AUTO NEGLIGENCE – PERSONAL INJURY
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE – PROPERTY DAMAGE
- 699 TORT – OTHER

Track III — 450 days' discovery

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 606 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES
- 620 FALSE CLAIMS ACT

Track IV — Active Case Management by Individual Judge / 450 days' discovery

- 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

Centrally Managed Litigation (Track IV)

- 280 Zelnorm
- 285 Stryker Trident Hip Implants

Mass Tort (Track IV)

<ul style="list-style-type: none"> 248 CIBA GEIGY 266 HORMONE REPLACEMENT THERAPY (HRT) 271 ACCUTANE 272 BEXTRA/CELEBREX 274 RISPERDAL/SEROQUEL/ZYPREXA 275 ORTHO EVRA 277 MAHWAH TOXIC DUMP SITE 278 ZOMETA/AREDIA 	<ul style="list-style-type: none"> 279 GADOLINIUM 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL 282 FOSAMAX 283 DIGITEK 284 NUVARING 286 LEVAQUIN 601 ASBESTOS 619 VIOXX
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If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category:

Verbal Threshold

Putative Class Action

Title 59